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REPLY TO: HAMPTON ROADS OFFICE

April 6, 2015

Hon. Martin Glenn
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, NY 10004-1408

RECEIVED

APR - 7 2015

U.S. BANKRUPTCY COURT, SDNY

In re: RESIDENTIAL CAPITAL, LLC, et al., Case No. 12-12020 (MG)
Chapter 11 Proof of Claim No. 5263

Dear Judge Glenn:

I am one of the attorneys representing Inner Campos Carranza and others similarly situated in a proof of claim in the above styled bankruptcy as well as in litigation now pending in the Eastern District of Virginia. I am writing today to request additional time to engage local bankruptcy counsel, conduct discovery and respond to the objections filed by the Rescap Borrower Claims Trust.

I filed a class proof of claim on behalf of Mr. Campos Carranza the above-styled matter. The Rescap Borrower Claims Trust filed an objection to Mr. Campos Carranza's proof of claim on February 18, 2015. (Doc. 8143-1). Upon being served with the objection, I immediately began to search for bankruptcy counsel to associate in the Southern District of New York. I requested consent to additional time to respond and to continue the hearing date, to which Rescap Borrower's Claims Trust Counsel agreed. During this time, I became ill and required treatment at the emergency department of Sentara Careplex in Hampton, Virginia, subsequent medical treatment, absence from my job and recuperation at home. Despite this absence, I eventually was able to locate and obtain the agreement of local bankruptcy counsel in New York, Mr. Karamvir Dahiya. Unfortunately, although Mr. Dahiya agreed to associate on this case, he was about to go on travel outside of the country for several weeks. He will not return until April 12,

2015. Upon Mr. Dahiya's return to the United States, he has agreed to enter an appearance and take an active and lead role in Mr. Campos Carranza's proof of claim.

The objection filed by Rescap Borrower's Claims Trust cites facts that are in dispute and therefore Mr. Campos Carranza requires discovery. We intend to seek certification of a class in the Eastern District of Virginia, where the claims arose.

This request is made in the interest of justice and not for a dilatory purpose. I have diligently sought to associate local bankruptcy counsel. For these reasons, on behalf of Mr. Campos Carranza, I respectfully request that the court:

Adjourn the hearing on this matter for a reasonable period of time for the claimant to conduct discovery and respond to the objection of the Rescap Borrower's Claim Trust.

Sincerely,


Susan M. Rotkis

Certificate of Service

On this 6th day of April, 2015, I served the foregoing letter to the following by FedEx overnight:

Hon. Martin Glenn
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, NY 10004-1408

Presiding Judge

On this 6th day of April, 2015, I served the foregoing letter to the following by first class U.S. Mail Postage prepaid:

Morrison & Foerster LLP
250 W. 55th St.
New York, New York 10019
Attn: Jordan Wishnew
Norman S. Rosenbaum
Jessica Arett

Counsel for the Rescap Borrower Claims Trust

Office of the United States Trustee
For the Southern District of New York
Attn: Linda A. Riffkin & Brian S. Masumoto
U.S. Federal Office Building
201 Varick Street, Suite 1006
New York, New York 10014

The ResCap Liquidating Trust
Quest Turnaround Advisors
800 Westchaster Ave. Suite S-520
Rye Brook, NY 10573

And by electronic mail to:

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